Before the Federal Communications Commission Washington, D.C. 20554

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In the Matter of

Advanced Television Systems)
and Their Impact Upon the) MM Docket No. 87-268
Existing Broadcast Service)

To: The Commission

COMMENTS OF RICHARD C. DEAN

Richard C. Dean, President of Maranatha Broadcasting Company,
Inc, licensee of UHF independent television station WFMZ-TV, Channel
69, Allentown, Pennsylvania, hereby responds to the Commissions's
FOURTH FURTHER NOTICE OF PROPOSED RULE MAKING AND THIRD NOTICE OF
INQUIRY, FCC 95-315, released August 9, 1995 ("Further Notice")
regarding the preservation of free over-the-air broadcast television
service amidst the conversion of the nation's television system from
NTSC to digital broadcasting.

Advanced television ("ATV"), and in particular the potential for digital multi-channel Standard Television ("SDTV") broadcasting, offers an incredible opportunity for existing broadcasters to begin to level the playing field on which they must compete with numerous multi-channel video service providers, some of which are capable of providing program choices ranging into the hundreds of channels! Encouragingly, moreover, the FURTHER NOTICE states as its foremost goal (Para 6) the preservation of "free, universal broadcasting service."

Unfortunately, however, the FURTHER NOTICE also threatens the

long-term viability of free, over-the-air television in Allentown in at least three respects. FIRST, it assumes that the public will not receive the benefits of ATV broadcasting unless the FCC mandates some degree of simulcasting of NTSC and ATV programming, and suggests that stations should also be required to broadcast some minimum amount of High Definition Television ("HDTV") programming. SECOND, it confuses the maximization of revenue from future spectrum auctions with the public interest and assumes -- incorrectly -- that all television stations will be able to bear, equally, the same cost burdens of converting to an ATV system. THIRD it fails to recognize that cable television will -- in the absence of effective regulation -- control the access of a majority of homes to broadcasters' ATV programming, to the ultimate detriment of those who cannot affort to or choose not to subscribe to cable, or who are tied to obsolescent cable technology.

Thus, the FCC's achievement of ITS OWN OBJECTIVE of preserving free, universal broadcast service depends on how it resolves those three basic issues.

The history of WFMZ-TV and local television broadcasting in Allentown illustrates the desolate future that confronts licensees and viewers in the smallest television markets if, in its haste to recapture spectrum and in disregard of the special problems faced by independent and smaller market stations, the FCC fails to assure to stations the opportunity to make an orderly transition to ATV.

The first WFMZ-TV began broadcasting on Channel 67 in about 1954, in an era when there were no click-stop UHF tuners, only rudimentary set-top converters, and cheap bow-tie antennas, that grossly discriminated against UHF stations and the local communities that

looked to them for service. The FCC had allotted VHF channels to the largest urban centers, and UHF channels to smaller cities and rural areas. The promise of these allotments to smaller communities was illusory. The disadvantage of UHF vis a vis VHF was so severe that, in a few markets, VHF channels had to be replaced with UHF channels, in order that all stations could compete on an equal footing. But, in most cases, UHF stations -- inherently disadvantaged by receiver and antenna design and the power efficiency of their VHF competitors -- quickly went dark and their communities were denied service until many years later.

So it was in Allentown. The first WFMZ-TV quickly went dark (as did four other UHF stations within 35 miles), and the Lehigh Valley -- Pennsylvania's third largest population center -- had no local commercial television broadcast service for more than twenty years. Then, after the All-Channel Receiver Act (and the growth of cable television which began in Pennsylvania) had, somewhat, leveled the playing field and the population dependent on free, over-the-air television service was able to receive UHF pictures that were comparable to VHF, the present licensee of WFMZ-TV brought a new station into being in 1976.

If the FCC adopts a regulatory scheme for ATV that prevents existing licensees from converting from NTSC to ATV in the way that best accounts for the differences between stations and markets, or mandates conversion to technology without mandating that all households have access to that technology, it will only succeed in recreating the mistakes made with the original Table of Television Allotments. Many communities will suffer long delays in realizing the benefits of free,

over-the-air ATV service, some viewers will lose program services on which they have come to rely, and some areas and populations may, at the end of the transition period, have in fact NO FREE over-the-air ATV or NTSC service at all. None of these outcomes is in the public interest.

- 1. PRIORITY ONE Considerable encouragement is discovered in the individual comments of each Commissioner who prioritizes the retention of free, over the air localized public service broadcasting without which, the discussion of ATV, or digital, or multi channel, or HDTV or spectrum efficiency would be worthless and meaningless.
- 2. FREE OVER-THE-AIR BROADCASTING This commentor will focus on the retention of a free traditional broadcast system while incorporating the incredible advantages of ATV. But with the obvious number of advantages there are countless legislative pitfalls that (if adopted) could easily undo the benefits and make mincement of what heretofore has been the envy of the entire world. This is our greatest fear.
- 3. TECHNICAL INNOVATIONS UNLIMITED The FCC is to be complimented on recognizing the latest innovations available in ATV beyond HDTV which was clearly the initial driving force for change. The market place forces should decide (not the Commission) if multiple SDTV signals, a combination of services, part time HDTV or a unique mix should be used. Major market television broadcasters will survive even under a bureaucratic mandate from five commissioners -but many independent and small market broadcasters may not. The proliferation of HDTV services from broadcast networks, cable networks, direct

satellite TV, MMDS, fiber optics and others will INSURE that viewers who require HDTV at some part of the day will have NO problem finding it. To require EVERYONE to do at least an hour or two of HDTV will mandate both equipment and program expenses beyond the capability of many. The considerable advantages of digital are realized under the proposed ATV digital mandate which is clearly sufficient, fully spectrum efficient and highly flexible. Why create these technical flexibilities and then legislatively dictate bureaucratic limitations on the premise of second guessing market preferences?

- 4. ARTIFICIAL RESTRICTIONS & BURDENS Such a mandate of even minimal (hour or two per day) HDTV for each and every broadcaster puts an associated burden on each and every viewer who presumably will be forced to PAY for features he may not need or desire in his new TV set. Enough that he is forced to go digital and throw out his existing TV receivers and associated VCR equipment. Interestingly, after decades of color, many viewers still seek out inexpensive black and white sets for their 3rd or 4th locations where limited viewing dictates a different standard of personal preferences. Likewise, the FCC wisely resisted a early proposal by struggling FMer's to mandate that all car radios be both AM & FM. The market has taken care of this all by itself to the advantage of everyone who buys a car. Neither was it necessary to mandate that every FM station transmit in stereo or every FM receiver decode it. The market works.
- 5. UNLEVEL PLAYING FIELD As the commission has clearly reiterated -the multiplicity of video signals now available to viewers numbers into the hundreds. But, paradoxically, the free over the air broadcasters, who started it all, are uniquely the ONLY single channel

operators left - and the ONLY ones who don't charge the viewers.

Without taking advantage of the MULTIPLE channels approach - it is
going to be real tough to compete and survive for many of us. Then
where will the free local off-air service television programs come
from? Even four or five TV channels through digital ATV compression is
less than TEN PERCENT of each of the broadcaster's competitor's
possibilities. Add to this the commission's naive determination to hit
the broadcasters with the SPECTRUM FEEs and endless regulatory red
tape. There is a myth in certain circles that all or most TV
broadcasters are fat cats with great bottom lines. There are some who
fit this category -the rest is pure myth How much do we want to SAVE
free local television broadcasting?

UNNECESSARY HURDLES - One transition is more than enough for broadcasters and the TV industry. If all TV broadcasters are indeed to be moved to the UHF spectrum in the ultimate ATV configuration -it is most shortsighted to consider a still further TV limitation or bunching to even less spectrum than channel 14 thru channel 69. The idea for additional interim channel being suggested to allow for ultimate "contiguous spectrum" redemption ignores a number of significant problems. The cost of creating an interim channel with its tuned cavities, specially constructed antennas along with temporary tower installations will be enormous and disruptive if not impossible The task of locating and/or negotiating sufficient space for for many. a suitable SECOND TV antenna is formidable and may well require years to complete when additional towers are required, with land acquisition, zoning approvals, FAA clearances, the resolving of environmental questions and all the neighbors are placated. Simply replacing an

antiquated TV tower with a modern rugged tower suitable for the anticipated multiple antennas required took our company SEVEN years to resolve all the hurdles and construct - and we already owned the land! And NOW to suggest an INTERIM channel installation to facilitate contiguous spectrum bundling is ludicrous.

- 7. A TRANSITION STEP would be a further disaster when considering the public's heavy dependency of receiving local and network television via their cable systems. Every change in channels requires extensive modifications in the headend receiving systems of cable networks. This costs them money and time and allows for still further delays in the timely carriage of broadcast stations in accordance with must carry provisions on the books. For the TV stations and their viewers it becomes the equivalent of closing down the highways of access for indefinite periods of time. This burden can be presently demonstrated in many markets where the must carry mandate is being ignored or delayed by cable companies concerning the carriage of certain existing local qualified TV broadcasters.
- 8. ALLOWING FOR GROWTH The future frequency requirements of television broadcasting and ancillary needs are sufficiently broad to clearly justify the retention of the entire present UHF spectrum for the free TV broadcast services to the public. There will be no hope of recovering the frequencies lost to mobile services above channel 69 as present and future TV requirements dictate. It would be shortsighted to further limit the existing UHF spectrum by suggesting further dilution. Questions remain in TV's broadcasting future involving translators and boosters to resolve the difficult terrain considerations in many parts of the country which do require spectrum.

Most TV stations in congested areas are already hurting in the matter of microwave links for remotes, specials and TV news gathering. They are in continuous danger of interference with each other because of the scarcity of allocated spectrum. These needs are definitely NOT being resolved adequately in other bands as of now, and the proposed future moves fall short of even present day requirements. The future of low power TV or a future equivalent for low budget local community services are likewise part of a spectrum question and can only be addressed with the retention of the complete existing UHF TV bandspread. Considering the twenty-first century, the recent developments of digital flexibilities should serve to dictate CAUTION in the matter of future assumptions on discovery and innovation—rather than to blindside us on tomorrow's technical revelations and inventions. How much do we really want to save free localized broadcast television?

In light of the aforementioned STIFLING LIMITATIONS massive channel discrepancies existing between the free over-the-air broadcasters (single channel to perhaps four or five) and every other competing service (fifty to three hundred or more channels) it makes little sense to pontificate on what further limits could be placed on the ATV channel holders. Indeed, the local broadcaster is going to be challenged to innovate and develop every conceivable means to survive the undeniable inequities. It is important to note that IF the market suggests a multiple channel approach -the ATV licensee should NOT be muzzled by the commission to create a one or two hour HDTV island if he has to dump his viewers on other SDTV channels to accommodate five people in DC who will not even be in the audience. To suggest that either technical restrictions or a "social contract" between

broadcasters and the Federal government (as cautioned by Commissioner Quello) be imposed - would relegate the broadcaster to a comparative INVALID status. Do we really want to continue a system of free overthe-air broadcasting?

- 10. ELIGIBILITY FOR ATV It would be totally without precedent to deprive the existing TV broadcaster (independent or network) of an opportunity to continue to serve the public and maintain his considerable broadcast investment ... on the basis of a major technical Nor could it be considered legitimate to open and frequency change. new frequencies to brand new players in historically served markets where video fragmentation has exploded along with program diversity to such an extent that the core audience of a local station can no longer support its operation. Nor should the question of eligibility be linked in any manner to the specific use being made of the 6 GHz ATV facility - seeing as how it is "a one-for-one exchange designed to accomplish a number of long-term public interest goals." Par 28, Docket A major FCC goal and industry standard IS accomplished in the shift from analog to digital and the VARIETY of new options thus The selection of these specific options will vary from created. station to station as the markets dictate. I note that the PUBLIC INTEREST GOALS are also market driven - and not bureaucratically invented. This is not to suggest that TV broadcasters are without the traditional "public interest, convenience and necessity" obligations they have accepted since their inception. No need to pile any more on.
- 11. UNIFIED LICENSES Please, by all means "ease administrative burdens on the Commission and broadcasters alike by authorizing the NTSC and ATV under a single, unified

license." Par 46, Docket 87-268.

- SMALL MARKETS & HYPHENATED MARKETS For a whole variety of 12. reasons - there remains hundreds of commercial television stations (including some independent UHFs) in the country whose income potential from within their respective markets will continue to be marginal regardless of the amount of community services provided. Their technical COSTS of doing business are comparable to the largest markets - but their income potential may be limited by market size, other media competitive factors, network availabilities, programming costs, over shadowing of major cities (hyphenated markets), unique programming considerations or economically disadvantaged areas. These markets are entitled to local free over-the-air broadcast service like the rest but will need to strive and connive with every conceivable tool just to "break even." Here again, they will need to have the widest possible technical latitude in offering the services their markets will respond There is literally NO FAT on the bones - no margin for error. a number of respects -these local commercial stations face very similar plights to that of the NONCOMMERCIAL STATIONS, except that they hold no auctions, receive no state grants, no federal grants and they pay taxes! Do we really want to save these free over-the-air local TV They truly need far less interference from Big Brother broadcasters? and maximum flexibility to get the job done. They don't need a handout or subsidy - but just to be left alone and they will strive for the impossible.
- 13. NONCOMMERCIAL STATIONS "Is there other relief that we can grant noncommercial broadcasters to minimize restrictions on their operations and allow them greater flexibility?" Par 76, Docket 87-268.

With this attitude from the Commission - hopefully extended to small market and hyphenated commercial stations as well - there is real hope for success into the transition of ATV! This is the only way for small market and noncommercial stations to survive. The likely demise of federal moneys for noncommercial stations is further impetus for maximum flexibility. The capability of airing a block of HDTV is not nearly as important as solvency and the retention of local services to the community. Many viewers won't detect the differences between a well produced SDTV program as compared with an HDTV special that cannot fit into the budget at all. Nearly all of these viewers would likely prefer the varieties of program offerings compared to watching their local station go dark. It is not likely that every driver will necessarily strive to drive a Cadillac convertible ... nor should every automotive dealer be mandated to offer them if his market wants the Chevy sedans. Again we return to a local market approach.

14. COMMERCIAL & NONCOMMERCIAL BIAS - We feel a deep concern at reading from the Commission's Subnote 77 on the bottom of page 28, Docket 87-268: "We see, however, no reason to extend the same treatment to commercial licensees whose financial environment is so much different from that of noncommercial broadcasters." Simply to adopt a "fixed" administrative attitude contrasting "commercial" as compared to "noncommercial" in determining flexibility and control factors is an oversimplification of bottom line facts relating to the survival of both. We believe the Commission itself has been given a "mandate" to adjust its regulatory manners in such a way as to provide for the best possible climates for the preservation of free over-the-air television broadcasting to the general public - whether commercial or

noncommercial. In response to the Commission's request to ask commentors to help "re-define what 'noncommercial' means" Par 76, Docket 87-268 we offer the following: Please, make no mistake about it - when a business "underwrites" a "noncommercial production" on a purely "noncommercial station" instead of sponsoring a "commercial production" on a "commercial station" ... there isn't a big enough difference to drive a nail through! The business sees them both as commercial advertising vehicles. Both stations regard the businesses as their advertisers and BOTH compete for many of the same dollars. The MYTH between defining an "underwriter" vs an "advertiser" is over three decades old ... and nobody laughs anymore!

15. TELEVISION RECEIVER REOUIREMENTS - A technical standard for selecting subchannels of each ATV signal needs to be technically defined for those who desire the variety of options that will be available within the 6 GHz digital channels. This will allow those who desire to receive every element within that signal to gain access. This should be compatible with any subchannel selector switch incorporated within cable tuners. However, the Commission aught not treat the public as ignorant children, having no idea what they want or what's good for them. If you want a multi-channel SDTV -you buy it. You want HDTV along with SDTV, plus digital audio channels -you buy it. If someone wants to manufacture cheap black and white digital SDTVs for 2nd or 3rd sets or for the kid's room - someone will buy them as well. The Commission will do well to help in defining the technical standards for the sake of compatibility. It has no business second guessing the market place and defining what the manufacturers must include in each receiver beyond the elements of digital compatibility and basic

standards. It might be helpful to simply require FULL DISCLOSURE regarding format capabilities. Computer literacy has never been higher, and numerous choices of audio and video gear with endless options have been on the market for years. Let the buyer beware - or at most, give them a 72 hour return policy ... but don't dare dictate every specific option. However, the Commission SHOULD INSIST on well shielded and properly designed front ends that will not pick up extemporaneous frequencies or legitimate transmissions from other radio frequency services or household appliances as some existing NTSC sets are notorious for. This would go a long way in minimizing complaints to the FCC in years to come.

- 16. MUST CARRY IF WE CHOOSE TO CARRY YOU The Must Carry program works about as well as the Congress's and the Commission's efforts to police television obscenities or to establish a true "safe harbor" to protect our children and grandchildren. Without the timely enforcement of the must carry provision the public will be at the mercy of any cable system wishing to deny the perceived competition of its broadcast neighbors on whose backs the cable industry was conceived and prospered.
- 17. COMPARABLE FREE ACCESS FOR ATV Without mandated cable coverage for local TV signals the ATV conversion will turn out to be a cruel hoax for the broadcasters and the public. Unless the "must carry" provisions follow into ATV to carry the digital SDTV and HDTV programming the access into television homes will be thwarted and disaster will shortly follow for the free television service we have known for the past half century. The cable channel tuner should be followed by a selector switch allowing for the choice of sub-channels

on the 6 MHz ATV digital signal. This would allow for the selection of four or five different SDTV choices or for HDTV if offered or a choice of digital audio services as available. The cable operator would simply carry the single ATV digital signal and the selector switch would break out the viewer's specific choices. This should provide for a compatibility within the digital cable system that would work on nonbroadcast digital channels likewise carried by cable. This subchannel selector switch approach (either on the cable tuner or on the TV receiver) offers the most direct and efficient options for the viewers -whether by direct reception off-air or through the local cable system. For cable systems not yet digitally compatible - an alternate interim approach will be necessary that may not offer the options otherwise available. Hopefully, cable will see the distinct local service advantages they have over other services such as direct satellite TV by the carriage of local and regional free over-the-air broadcast services. Cable will have the further unique advantage of offering an optional two-way inner active service into the digitally equipped TV subscriber's home either by coaxial cable or fiber optics.

18. FREE TELEVISION FINALLY FULFILLS VISION - Chairman Hundt echos the vision of a 1945 (50 years ago) predecessor, Chairman Paul Porter, who "expressed the hope that television would truly 'inform, educate and entertain an entire nation." Chairman Hundt also confirms that this vision is to be fulfilled by "free over the air television," after announcing the beginning of the "digital chapter." It's likewise true that "our kids stand the most to gain, and the most to lose, from our decisions in this proceeding." We cannot allow the beginning of this exciting new chapter to hail the conclusion of our free over-the-

air service.

19. SINGLE CHANNEL BROADCASTING IN MULTICHANNEL WORLD -We come back to the incredible inequities facing broadcasters in this new world of 100+ Cable Channels, DBS, MMDS, VCRs, Fiber Optics and "Ma Bell's" Video Dial Tone plus the new Internet! Commissioner Quello fears that "Those who have money will receive all of the exciting new services this technology offers; those without money will receive nothing." Perhaps there is no free lunch - but traditional over-the-air TV broadcasters have come the closest to feeding the multitudes without taking up a collection from them. There must be a determination to keep this great American Tradition from turning into a great American Tragedy. There was a time when free broadcasters were considered worthy of the second 6 MHz channel - to keep and develop it with additional capital investment in equipment and personnel. To provide a small degree of equity for the broadcasters who do it FOR FREE for the public. We would and do suggest a serious RECONSIDERATION of this approach - based upon a minimal commitment of at least TWO free overthe-air programming channels to the public. This would represent the smartest investment of the Federal Government in the future of FREE BROADCASTING for the next half century. The alternative of auctioning the repossessed spectrum provides only a ONE-TIME hit for the treasury - in 12 or 15 years. By investing in "The World's Best Bargain" (free over-the-air television), a far better chance exists that the broadcasters will more effectively compete and survive to continue this uniquely unparalleled free service. Their investments in equipment, production, personnel and programming would begin immediately and far surpass the amount of return this nation could otherwise realize some

15 years from now!

- 20. DO NOT LOSE SIGHT OF FCC'S OVERARCHING GOALS In separate statement Commissioner Barrett confirms a statutory mandate: "I hope that we do not lose sight of one of the Commission's overarching goals—to ensure that free, over—the—air broadcasting remains available to all consumers while ensuring that digital television fully serves the public interest." I am further encouraged by the following acknowledgment: "We are now compelled to consider a more flexible digital broadcast television technology—one that may encompass a myriad of services including those that may be nonvideo and/or subscription—based in nature." There may be hope for the "minimal channel broadcasters" after all. A bit of caution would be in order ... "the Devil is in the details." If too many hooks and conditions and fees emerge in the process of "protecting free over—the—air broadcasting" we might still manage to kill the goose.
- 21. COMPETITORS CAN GO DIGITAL WITHOUT FCC ACTION A clear case of the unlevel playing field is brought to the doorstep by Commissioner Ness as she notes: "For broadcasters to remain competitive, however, the FCC must act to provide them with the tools to compete." It is just these tools that the free broadcasting community has been striving for in the past decade as technology has opened new venues of service. While we welcome these tools and are prepared to borrow millions to build the digital system we reiterate our concern that more than "tools" will be offered to the broadcasters. The specter of "Big Brother knows best" looms heavy with seasoned broadcasters who hear the subtle threats requiring free time for political debate, etc., etc., etc., as if we haven't already been doing most of these things in

response to public demand for the past 60 years! To the Commission we ask - "please trust the market to lead." We strongly agree with Commissioner Ness's hope: "For the American public, this new technology holds the promise of substantially more and, I hope, better quality programming. Broadcasting is the only video delivery system that is offered free of charge, universally available and, therefore, accessible to all, young or old, rich or poor. Advanced television assures the future viability of free over-the-air television." She concludes: "The considerable value of free over-the-air broadcasting must be preserved--and enhanced." To which we say -"AMEN"!

FLEXIBLE REGULATORY FRAMEWORKS - "We must not be afraid to put aside decisions that have been overtaken by advances in technology, and be forward looking to a new age in which we adapt proven successes like free, over-the-air broadcasting to new technologies like digital." -Commissioner Chong. Would it not be wise to advocate the greatest flexibility to the licensee in his service to the public, and not attempt to second guess the local market demands from the confines of Washington, D.C. -knowing that the "stick" is always available to correct the errant servant? Have we not been witness to broad and consistent testimony within Docket 87-268 praising the outstanding historical record of the free over-the-air broadcasters since their fledgling conception some six decades ago? Most of us work very hard, in spite of an aberrant consensus that all broadcasters are a bunch of "fat cats" just rolling in the money stream. There IS NO SCARCITY of voices in the media. Yet the present thinking in Washington is no longer limited to recovering the actual costs in regulating the spectrum - but to separately TAX the broadcasters simply because they

exist and have taken on the challenge of serving the public at no charge. There are no comparable license or user fees for other media ... and they are market driven and enjoy full first amendment rights.

SUMMARY & CONCLUSION

- * Everybody wants to be on the record to save free over-the-air broadcasting at all costs and to add flexibilities.
- * Everybody likes digital ATV and all the options it offers.
- * Some regulators want to add more regulations or obligations for free broadcasters in addition to mandating the move.
- * Everybody recognizes that broadcasters are the only ones still not charging the public but are vastly outnumbered in channel capacity by 50 to 100 times!
- * The Commission is reluctant to address the unlevel playing field by allowing the broadcasters to develop both 6 GHzs.
- * Some Commissioners would actually impose an additional costly interim step in getting to final channel locations.
- * To compete and survive broadcasters need more channels, but the Commission is obsessed with recovering contiguous blocks of spectrum from television for a future auction.
- * Broadcasters are prepared to invest their own resources in the 21st Century over-the-air ATV system of continued free television to the public anticipating expansion.
- * Some regulators are prepared to second guess 21st Century ATV requirements now and scuttle any real expansion for existing broadcasters except within "one" 6 MHz channel.
- * Some Commissioners believe they should impose specific HDTV

requirements across the board. ATV broadcasters should be free to adjust to market conditions like each of their many competitors - not shackled to the whims of a bureaucracy.

- * Commissioners speak to their special concerns facing the small markets and noncommercial broadcasters. Only detailed actions will prevail to address these real needs.
- * Television receiver requirements need to be addressed for standardization and compatibility definitions. Specific options in each set should be market driven.
- * "Must Carry" must carry over into ATV if free localized broadcasting to the public is to continue. A subchannel selector switch for the various options is most practical.
- * Free Television finally can fulfill the vision. Can we let it grow ... will we force feed it ... will we starve it?
- * Broadcasters are prepared to compete in the exploding video market place if the Commission will not confiscate over half its spectrum but allow it the room it needs to grow.
- * Can we commit to an honest flexible regulatory framework?
- * How much do we really want to preserve free local market television broadcasting?

Respectfully,

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